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LLC

14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 CORONIS HEALTH RCM, LLC; and  
17 PRACTICAL HOLDINGS, LLC, F/K/A  
18 PRACTISOURCE, LLC,

19 Plaintiffs and Counter-  
Defendants,

20 vs.

21 NEXTGEN LABORATORIES, INC,

22 Defendant and Counter-  
23 Claimant.

Case No.: 8:23-cv-00111-FWS-DFM  
Assigned to Hon. Fred W. Slaughter

**PLAINTIFFS' NOTICE OF  
SUPPLEMENTAL EVIDENCE IN  
SUPPORT OF MOTION TO  
ENFORCE SETTLEMENT (ECF  
NO. 115)**

Date Filed: December 2, 2022

Date Removed: January 18, 2023

Trial Date: Not set

1 On July 8, 2024, this Court took under submission the unopposed Motion to  
2 Enforce the Settlement Agreement filed by Plaintiffs Coronis Health RCM, LLC and  
3 Practical Holdings, LLC (together, “Coronis”). (ECF No. 115, 116, 117.) In the  
4 Motion to Enforce, Coronis requested that the Court enforce the terms of the  
5 settlement by dismissing NextGen’s counterclaims with prejudice and entering  
6 judgment in favor of Coronis. (ECF No. 115.) NextGen filed a Notice of Non-  
7 Opposition to Coronis’ Motion, expressly stating that NextGen “*does not oppose, and*  
8 *will not file an opposition to, Plaintiff’s Motion to Enforce Settlement and Enter*  
9 *Judgment.*” (ECF No. 116 (emphasis added).) Since the date that Coronis filed its  
10 unopposed motion, new evidence has come to light that supports an expedited  
11 determination and judgment in favor of Coronis.

12 First, the evidence suggests that NextGen is no longer actively engaged in  
13 business at its Newport Beach, California location. From June 6, 2024, through June  
14 14, 2024, a process server visited NextGen’s place of business three times during  
15 normal business hours to serve NextGen with a copy of Coronis’ Motion to Enforce.  
16 (Aff. of Non-Service on NextGen, Ex. A; Supp. Decl. of Jacob A. Rey ¶ 2, Ex. B.)  
17 During these attempts, no one appeared to be inside, the business was closed and  
18 locked, there were no cars in the parking lot, and there were no lights visible inside.<sup>1</sup>  
19 (Aff. of Non-Service on NextGen, Ex. A.)

20 Second, NextGen no longer maintains an active website for its business. During  
21 the last several months, NextGen removed the website it formally maintained at  
22 nextgenlabs.com. *See* <http://www.nextgenlabs.com>; (NextGen LinkedIn Profile, Ex. C  
23 (showing <http://www.nextgenlabs.com> as the website for NextGen Laboratories;  
24 Supp. Decl. of Jacob A. Rey ¶ 3, Ex. B).) A Google search for “NextGen  
25 Laboratories” does not reveal any active websites for the company. (Supp. Decl. of  
26 Jacob A. Rey ¶ 3, Ex. B.)

27 <sup>1</sup> Coronis also attempted to serve NextGen’s registered agent at his personal  
28 address. NextGen’s registered agent did not respond to the process server’s attempts.  
(Aff. of Non-Service on A. Graves, Ex. D.)

1 Third, NextGen's counsel has not responded to undersigned counsel's attempts  
2 to contact NextGen. Counsel for Coronis has attempted to contact counsel for  
3 NextGen *at least six times* since May 19, 2024. (*Id.* ¶ 4.) NextGen's counsel has not  
4 returned any of these emails or voicemails. (*Id.*)

5 All of this evidence suggests that, once a judgment against NextGen became  
6 apparent, NextGen closed its doors and began transferring its assets elsewhere. In light  
7 of this evidence, an expedited determination of Coronis' unopposed motion is proper.  
8 Delaying entry of judgment will likely prejudice Coronis' right to collect the  
9 judgment to which it is entitled.

10 NextGen would not be prejudiced by an expedited determination on Coronis's  
11 unopposed motion. Indeed, NextGen does not oppose Coronis' motion.

12  
13  
14 Dated: July 25, 2024

Wheeler Trigg O'Donnell LLP

15 By: /s/Jacob A. Rey

16 Galen D. Bellamy

17 Jacob A. Rey (*pro hac vice*)

Jacob D. Taylor (*pro hac vice*)

18 and

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20 Dean J. Zipser

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21 Attorneys for Plaintiffs & Counter-Defendants  
22 Coronis Health RCM, LLC and Practical  
23 Holdings, LLC  
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**CERTIFICATE OF SERVICE (CM/ECF)**

I hereby certify that on July 25, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/Jacob A. Rey  
Name